

September 10, 2016

VIA ELECTRONIC SUBMISSION

***EX PARTE*** COMMUNICATION

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

RE: Transition from TTY to Real Time Text Technology,  
CG Docket No. 16-145

Dear Ms. Dortch:

On Thursday, October 6, 2016, the undersigned (in person), Roger Marshall - Senior Member Technical Staff, Jeff Martin – Technical Fellow, and Todd Poremba – Senior Director Product Management (all via telephone), all from Comtech Telecommunications Corp. (“Comtech”), met with members of the Federal Communication Commission’s (“Commission”) Public Safety and Homeland Security Bureau (“PSHSB”) and Governmental Affairs Bureau (“CGB”) / Disability Rights Office (“DRO”). Comtech appreciates the opportunity to meet with both Bureaus.

The discussions centered on the topics notice in the PowerPoint slides attached to this filing. The slides review the issues related to the delivery of Real-Time Text (“RTT”) to Public Safety Answering Points (“PSAPs”) raised in the Commission’s Notice of Proposed Rulemaking released April 29, 2016 in the above-referenced docket<sup>1</sup>, including the steps and technical issues necessary to deploy end-to-end RTT. Comtech explained that the deployment of RTT must consider PSAP operational impacts and should be implemented in a manner that accounts for both the short-term TTY-RTT transitional goals to support RTT text and call flows, and the long-term goals of supporting integrated voice and full i3-compatible PSAPs (voice and text) to support native RTT implementation.

Comtech believes that the Commission’s should strive to limit the period of backward compatibility as much as practicable in order to minimize the impact from legacy TTY 911 failings on IP-based systems and RTT-TTY interoperability inefficiencies. To that end, Comtech supports an RTT deployment solution that includes support for TTY, but also highlights the advantages of and encourages PSAPs to transition away from TTY swiftly and effectively.

Unfortunately, due to time constraints, Comtech was not able to cover all topics in the agenda equally, and reserves the opportunity to review these same slides in a future conversation with the Commission that will be denoted by a new separate ex parte.

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter is being electronically filed via ECFS with your office and a copy of this submission is being provided to all FCC employees mentioned herein.

Please direct any questions as to this matter to the undersigned. Thank you.

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<sup>1</sup> *Transition from TTY to Real-Time Text Technology et al., Notice of Proposed Rulemaking*, FCC 16-53, CG Docket No. 16-145, GN Docket No. 15-178 (rel. Apr. 29, 2016) (NPRM), available at [https://apps.fcc.gov/edocs\\_public/attachmatch/FCC-16-53A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/FCC-16-53A1.pdf) Comment and Reply dates set with publication in the Federal Register on May 25, 2016, <https://ecfsapi.fcc.gov/file/60002056396.pdf>



Sincerely,

/s/

Kim Robert Scovill, Esq.

Vice President – Legal, Regulatory, and External Affairs

Cc:

Henning Schulzrinne, Chief Technology Officer (OSP) (via phone)

Karen Peltz Strauss, Deputy Bureau Chief, (CGB)

Michael Scott, Attorney Advisor, (CGB / DRO)

David Furth, Deputy Bureau Chief, (PSHSB)

Brenda Boykin, Attorney Advisor, (PSHSB)

Timothy May, Policy and Licensing, (PSHSB)